

CLAIMS

1. A system for implementing a compliance program in a financial institution, comprising;

a list database for storing material information regarding a plurality of entities that is known to said financial institution;

a list manager, said list manager receiving a compliance query from an affiliate of the financial institution having a status, said list manager providing a compliance response to said affiliate based on said plurality of entities and according to said status of said affiliate.

2. The system of claim 1, wherein said material information regarding the plurality of entities is partitioned into a Grey list and a Restricted List.

3. The system of claim 2, wherein said affiliate is an employee, said compliance query is a request by said employee to trade a security of an entity and said compliance response is a denial of said request to trade if said entity is included in the partition of said plurality of entities included in said Restricted List.

4. The system of claim 2, wherein said affiliate is a trader, said compliance request is a request to trade a security of an entity and said compliance response includes at least one of said plurality of entities included in said Restricted List and a clearance code.

5. The system of claim 4, wherein associated with said at least one of said plurality of entities is a transaction type and said request to trade has an activity type and wherein said clearance code denies said request to trade based on said transaction type and said activity type.

6. The system of claim 5, wherein said transaction type is selected from a group including mergers and acquisitions, initial public offerings and tender offers.
7. The system of claim 5, wherein said activity type is selected from a group including principal activity, market making activity, positional trading activity and derivative trading activity.
8. The system of claim 2, wherein said affiliate is a supervisory analyst, said compliance request is a request to issue a report regarding an entity and said compliance response includes at least one of said plurality of entities included in a combination of said Restricted List and said Grey List.
9. The system of claim 8, wherein said compliance response includes at least one safe harbor provision that grants at least a portion of said compliance request.
10. The system of claim 9, wherein said grant of said portion of said compliance request is based on geography.
11. The system of claim 2, wherein said affiliate is a compliance officer, said compliance request is a request to view at least a portion of a combination of said Restricted List and said Grey List and said compliance response includes said portion of the combination of said restricted list and said Grey List.
12. The system of claim 11, wherein said compliance response includes for at least one of said plurality of entities included in said portion a clearance code and a transaction type.
13. The system of claim 11, wherein said compliance response includes for at least one of said plurality of entities included in said portion a safe harbor provision.

14. The system of claim 1, further comprising a surveillance system wherein said surveillance system receives said plurality of entities stored in said list database for monitoring trading activity in accordance with said compliance program.
15. The system of claim 1, wherein said list database receives said plurality of entities from a compliance officer in communications with said system.
16. The system of claim 1, wherein said list database receives at least a portion of said plurality of entities from a transaction information source.
17. The system of claim 1, wherein said list database receives positional information relating to said financial institution and wherein said compliance response is based on said positional information.
18. The system of claim 1, wherein said list database receives affiliate directorship information and wherein said compliance response is based on said affiliate directorship information.
19. A method for implementing a compliance program in a financial institution, comprising the steps of;
- storing a plurality of entities, said financial institution being associated with each of said plurality of entities;
 - receiving a compliance query from an affiliate of the financial institution having a status; and
 - providing a compliance response to said affiliate based on said plurality of entities and according to said status of said affiliate.
20. The method of claim 19, further comprising the step of:
- partitioning said plurality of entities into a Grey List and a Restricted List.

21. The method of claim 20, wherein said affiliate is an employee, said compliance query is a request by said employee to trade a security of an entity and said compliance response is a denial of said request to trade if said entity is included in one of said plurality of entities included in said Restricted List.

22. The method of claim 20, wherein said affiliate is a trader, said compliance request is a request to trade a security of an entity and said compliance response includes at least one of said plurality of entities from said Restricted List that includes said entity and a clearance code.

23. The method of claim 22, wherein said at least one of said plurality of transactions have a transaction type and said request to trade has an activity type and wherein said clearance code denies said request to trade based on said transaction type and said activity type.

24. The method of claim 23, wherein said transaction type is selected from a group including mergers and acquisitions, initial public offerings and tender offers.

25. The method of claim 23, wherein said activity type is selected from the group including principal activity, market making activity, positional trading activity and derivative trading activity.

26. The method of claim 20, wherein said affiliate is a supervisory analyst, said compliance request is a request to issue a report regarding an entity and said compliance response includes at least one of said plurality of entities from a combination of said Restricted List and said Grey List that includes said entity.

27. The method of claim 26, wherein said compliance response includes at least one safe harbor provision that grants at least a portion of said compliance request.

28. The method of claim 27, wherein said grant of said portion of said compliance request is based on geography.
29. The method of claim 20, wherein said affiliate is a compliance officer, said compliance request is a request to view at least a portion of a combination of said Restricted List and said Grey List and said compliance response includes said portion of the combination of said Restricted List and said Grey List.
30. The method of claim 29, wherein said compliance response includes for at least one of said plurality of entities included in said portion a clearance code and a transaction type.
31. The method of claim 29, wherein said compliance response includes for at least one of said plurality of entities included in said portion a safe harbor provision.
32. The method of claim 19, further comprising the step of:
monitoring trading activity in accordance with said compliance program based on said plurality of entities stored.
33. The method of claim 19, further comprising the step of:
receiving said plurality of entities from a compliance officer.
34. The method of claim 19, further comprising the step of:
receiving at least a portion of said plurality of entities from a from a transaction information source.
35. The method of claim 19, further comprising the steps of:
receiving positional information relating to said financial institution; and
providing said compliance response based on said positional information.
36. The method of claim 19, further comprising the steps of:

receiving affiliate directorship information; and
providing said compliance response based on said affiliate directorship
information.

37. A system for monitoring trading activity of a trading system operated by a
financial institution in accordance with a compliance program, said trading system
receiving a trade request to trade a security of an entity, the system comprising;

a list database for storing a plurality of entities, said financial institution being
associated with each of said plurality of entities;

wherein said trading system receives said plurality of entities from said list
database and wherein said trading system allows said trade request if said entity is not
included in said plurality of entities.

38. The system of claim 37, wherein said entity is included in at least one of said
plurality of entities having a transaction type and said request to trade has an activity type
and wherein said trading system allows said trade request based on said transaction type
and said activity type.

39. The system of claim 38, wherein said transaction type is selected from a group
including mergers and acquisitions, initial public offerings and tender offers.

40. The system of claim 38, wherein said activity type is selected from a group
including principal activity, market making activity, positional trading activity and
derivative trading activity.

41. The system of claim 37, wherein said list database receives at least a portion of
said plurality of entities from a transaction information source.

42. The system of claim 37, wherein said list database receives positional information relating to said financial institution and wherein said trading system denies said trade request based on said positional information.

43. The system of claim 37, wherein said list database receives affiliate directorship information and wherein said trading system denies said trade request based on said affiliate directorship information.

44. A method for monitoring trading activity of a trading system operated by a financial institution in accordance with a compliance program, the method comprising the steps of;

storing a plurality of entities, said financial institution being associated with each of said plurality of entities;

receiving a trade request to trade a security of an entity;

determining whether said entity is included in said plurality of entities; and

allowing said trade request if said entity is not included in said plurality of entities.

45. The method of claim 44, wherein said entity is included in at least one of said plurality of entities having a transaction type and said request to trade has an activity type and wherein the step of allowing said trade request includes the step of:

allowing said trade request based on said transaction type and said activity type.

46. The method of claim 45, wherein said transaction type is selected from a group including mergers and acquisitions, initial public offerings and tender offers.

47. The method of claim 45, wherein said activity type is selected from a group including principal activity, market making activity, positional trading activity and derivative trading activity.

48. The method of claim 44, further comprising the step of:
receiving at least a portion of said plurality of entities from a transaction information source.

49. The method of claim 44, further comprising the steps of:
receiving positional information relating to said financial institution; and
denying said trade request based on said positional information.

50. The method of claim 44, further comprising the steps of:
receiving affiliate directorship information; and
denying said trade request based on said affiliate directorship information.